

REMARKS

Status of the Application

Claims 1-3, 7-11 and 13-25 are all the claims pending in the Application. Claims 1-4, 7-11 and 13-19 and 21-25 stand rejected.

Allowable Subject Matter

Applicants thank the Examiner for indicating that claim 20 would be allowed if rewritten in independent form. However, Applicants respectfully request that the Examiner hold in abeyance such rewriting until the Examiner has had an opportunity to reconsider (and withdraw) the prior art rejection of the other claims.

Additionally, Applicants hereby add new independent claim 26, which corresponds to allowable dependent claim 20 rewritten in independent form. Applicants respectfully submit that new independent claim 26 should be immediately allowable.

Claim Objections

The Examiner has objected to claim 19, alleging that it is unclear. Claim 19 recites that “the thickened portions of the first insulating film are formed by mask supporting layers arranged between the first insulating film and the inter-layer insulating film.” An example of a structure upon which claim 19 reads is shown in FIG. 5C, which shows a “thickened portion” (the portion formed by mask supporting layer 18) formed by “mask supporting layers (mask supporting layer 18) arranged between a “first insulating film” (insulating film 15) and an “inter-layer insulating film” (interlayer insulating film 12). Thus, Applicants respectfully submit that claim 19 is clear.

In view of the above, Applicants respectfully request withdrawal of this objection.

Claim Rejections

The Examiner has rejected: (1) claims 1, 2, 18, 19, 22, 24 and 25 under 35 U.S.C. § 102(e) as being anticipated by *Yamada et al.* (US 6,768,257; hereinafter “*Yamada*”); (2) claims 3, 21 and 23 under 35 U.S.C. § 103(a) as being unpatentable over *Yamada*; and (3) claims 7-11 and 13-17 under 35 U.S.C. § 103(a) as being unpatentable over *Yamada* in view of *Nagayama et al.* (US 5,701,055; hereinafter “*Nagayama*”). These rejections are respectfully traversed.

Independent Claim 1

Applicants respectfully submit that *Yamada* fails to teach or suggest “a plurality of ITO films and wirings which are disposed on an inter-layer insulating film.” Rather, as shown in FIG. 5A of *Yamada*, lower electrode 10 (which is cited by the Examiner as being comparable to the recited “ITO films”) is formed above second interlayer insulating film 7 (which is cited by the Examiner as being comparable to the recited “inter-layer insulating film”) while wiring 6 is formed below second interlayer insulating film 7. Thus, wiring 6 and lower electrode 10 cannot reasonably be read as being “disposed on an inter-layer insulating film.”

Thus, Applicants respectfully submit that independent claim 1 is patentable over *Yamada*. Further, Applicants respectfully submit that rejected dependent claims 2, 3, 18, 19 and 21-25 are allowable, *at least* by virtue of their dependency.

Independent Claim 7

Applicants respectfully submit that *Yamada* and *Nagayama* fail to teach or suggest that “a plurality of insulative mask supporting layers that protrude in a reverse tapered shape from the insulating film, and are disposed in a stripe pattern.”

Specifically, while the Examiner has alleged that the insulating material layers 14 of *Yamada* are similar to the recited “mask supporting layers,” (except with respect to the reverse tapered shape, which is allegedly shown in *Nagayama*), Applicants respectfully submit that these portions 14 are formed only at junctions (see FIG. 9 of *Yamada*), and are not disposed in a stripe pattern.

Thus, Applicants respectfully submit that independent claim 7 is patentable over *Yamada* and *Nagayama*. Further, Applicants respectfully submit that rejected dependent claims 8-11 and 13-17 are allowable, *at least* by virtue of their dependency.

Thus, Applicants respectfully request that the Examiner withdraw this rejection.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-3, 7-11 and 13-26 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-3, 7-11 and 13-26.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Amendment Under 37 C.F.R. § 1.116
U.S. Application No. 10/041,668

Attorney Docket # Q67887

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,



Timothy P. Cremen
Registration No. 50,855

SUGHRUE MION, PLLC
2100 Pennsylvania Avenue, N.W.
Washington, D.C. 20037-3213
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: January 18, 2006